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**February 21, 2019**

**VIA ECF**

Magistrate Judge Sanket J. Bulsara  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Chambers 304N, Courtroom 324N  
Brooklyn, New York 11201

Re: American Steamship Owners Mutual Protection and Indemnity Association, Inc. v.  
Pacific Gulf Shipping Co.  
MISC 18-3457

Dear Magistrate Judge Bulsara -

We are counsel for the Respondent Pacific Gulf Shipping Co. ("Pacific Gulf") in the above referenced matter. We write to provide the Court with an update following the hearing in the underlying Oregon Proceeding, *Pacific Gulf Shipping Co. v. Adamastos Shipping & Trading S.A., et al.*, 3:18-cv-2076-MO (D. Ore. 2018), on February 19, 2019. The parties in that action have agreed to a proposed discovery and case management schedule which has been submitted to District Judge Mosman for approval.

As the Court noted in the February 19, 2019 electronic order, there is no objection to the American Club responding to the Rule 45 subpoena and making a complete production on or before March 1, 2019. The American Club has made two (2) partial productions thus far (on February 15, 2019 and February 19, 2019), which Pacific Gulf is in the process of reviewing. Should further Court intervention be required, Pacific Gulf will comply with the meet and confer obligations imposed by the Federal Rules of Civil Procedure and the Local Rules of this Court prior to filing any motion.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

CHALOS & Co, P.C.

A handwritten signature in blue ink, appearing to read "BSP".

Briton P. Sparkman



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cc: Via ECF

*All Counsel of Record*